UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

October 28, 2011

Walter E. George, National Project Manager
Bureau of Land Management
Gateway West Project
P. O. Box 20879
Cheyenne, Wyoming 82003

Re: U.S. Environmental Protection Agency (EPA) Comments on Draft Environmental Impact Statement (DEIS) for the Gateway West Transmission Line Project.
(CEQ# 20110239; EPA Project Number 08-035-BLM)

Dear Mr. George:

The EPA has reviewed the Bureau of Land Management's (BLM) DEIS for the Gateway West Transmission Line Project in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the EIS considers the expected environmental impacts and the adequacy of the EIS in meeting procedural and public disclosure requirements of the NEPA. We have assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the DEIS. A copy of our rating system is enclosed.

We commend the lead and cooperating agencies and the proponents for their planning efforts on this Project. Those efforts have resulted in the avoidance and minimization of numerous potential impacts to the environment, and have laid the early foundation for appropriate mitigation of unavoidable impacts.

While the planning effort has been commendable, especially the stakeholder involvement and the thoughtful development of route alternatives and Environmental Protection Measures, we note that the Project, as proposed, would contribute to several substantial and considerable adverse cumulative impacts to the environment.[1] Project impacts of primary concern include impacts to: cultural resources (including those which are of interest to affected tribes); land-use (as a result of the cumulative implications of reclassifying allowable levels of visual contrast on large areas of public lands); and biological resources (caused by habitat loss and fragmentation for sagebrush and riparian-obligate species).

To address these impacts of primary concern, we support and encourage the proponents' and agencies' efforts to fully address all of the related concerns and recommendations provided on the DEIS during this comment period. In addition to our comments, we expect that helpful recommendations will be forthcoming from other individuals and entities, such as experts who analyze cumulative impacts of

[1] DEIS, p. ES 25-26

resource management and forest plan amendments, affected Tribes, wildlife agencies, and advocacy groups. We hope that this collective input will inform additions and revisions to the FEIS. Hosting public meetings between now and publication of the FEIS, granting an extended FEIS comment period, and refining FEIS alternatives where possible are all actions which would be consistent with this recommendation.

Our enclosed detailed comments address the following topics:

- Wetlands and Riparian Areas
- Water Resources
- Air Quality
- Existing Transmission System Constraints
- Environmentally Preferable Alternative
- Cultural Resources
- Mitigation and Monitoring
- Invasive Plant Species

We address these topics in order to focus our perspectives on issues which are particular to our authorities and in the interest of positively contributing to project planning which aims to achieve protection of the environment at a project-wide scale

Thank you for this opportunity to comment. If you have any questions regarding the EPA's comments, please contact me at (206) 553-1601or by electronic mail at reichgott.christine@epa.gov , or Erik Peterson, the lead reviewer for this project. Erik can be reached at (206) 553-6382 or peterson.erik@epa.gov.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures:
EPA Detailed Comments on the Draft Environmental Impact Statement for the Gateway West Transmission Line Project
EPA Rating System for Draft Environmental Impact Statements

DETAILED EPA COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE GATEWAY WEST TRANSMISSION LINE PROJECT

Wetlands and Riparian Areas

Clean Water Act Section 404(b)(1) Guidelines

We would like to note that the NEPA process does not constrain the U.S. Army Corps of Engineers' obligation to evaluate practicable alternatives under Section 404 of the Clean Water Act (CWA). While, ideally, the NEPA process takes into account the Section 404 permitting process, the Record of Decision does not necessarily dictate what can or will ultimately be permitted. Therefore, demonstrating compliance with the Section 404(b)(1) Guidelines (Guidelines)[2] during the NEPA process is highly encouraged.

Functional Assessments and Estimating Impacts to Waters of the U.S.

We agree with the DEIS's conclusion that wetlands and riparian areas are limited in the Project's portion of the Intermountain West region. The limited nature of wetlands and riparian areas in this Project area can increase their environmental value. For example, according to the Wyoming Joint Ventures Steering Committee, a collaboration of federal and state agencies and Non-Governmental Organizations, the Bear River Wetland Complex – which is in the Project area - is the "...largest, most productive and most diverse continuous wetland for avifauna known to exist in Wyoming".[3]

Extra effort should be taken to protect rare, limited and/ or difficult to replace aquatic resources. Regardless of type or frequency, however, the Guidelines require that all appropriate and practicable measures be taken to minimize potential harm to the aquatic ecosystem (40 CFR 230.12(3)(iii)).

Integrating functional assessment methodologies into relevant Project planning would allow for a greater understanding of the specific or unique roles that aquatic resources along the project corridor provide. This greater understanding, in turn, leads to a more accurate account of potential impacts and determination of adequate compensatory mitigation for any remaining unavoidable impacts.

Recommendations

- To adequately address the functions and values of potentially impacted aquatic resources, we recommend the maximum possible integration of functional assessment methodologies into relevant Project planning. Conducting functional assessments early and often – both for the FEIS and in Clean Water Act Section 404 permitting processes - would increase the likelihood that the functions and values of potentially impacted aquatic resources would be adequately accounted for and protected.

- As an initial step to integrating the use of functional assessments, we recommend that the FEIS include qualitative discussion(s) of the alternatives' relative impacts to project area aquatic resources from a functions and values perspective. Conducting functional assessments assists in the determination and selection of the Least Environmentally Damaging Practicable Alternative

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[2] CFR 40 Part 230 Section 404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material at http://www.wetlands.com/epa/epa230pb.htm

[3] http://gf.state.wy.us/habitat/WetlandConservation/Wyoming%20Wetlands%20Conservation%20Strategy%20September%207,%202010.pdf

(LEDPA), as required by the Guidelines. The LEDPA may not necessarily entail the smallest number of wetland acreage or stream crossings.

We appreciate the proponents' efforts to identify waters of the U.S. through multi-spectral imagery, National Wetland Inventory datasets, existing GIS hydric soil layers, and field verification. Developing and utilizing this type of information to avoid and minimize impacts to aquatic resources is appropriate for this NEPA process and consistent with meeting requirements under the Clean Water Act. The level of detail is generally adequate for a DEIS, but, would not be sufficient at the FEIS stage.

Our interest is to ensure that the FEIS includes recent important geospatial analyses of aquatic resources as part of our broader expectation for iteratively updated and improved detailed estimates of impacts to waters of the U.S. These iterative improvements should occur throughout the NEPA and the CWA Section 404 permitting processes and will eventually need to achieve a high level of detail (e.g., locations of pads, roads, crossings, engineered drawings, etc.).

Recommendation

- To increase the accuracy of impact estimates to waters of the U.S. and the effectiveness of the proponents' aquatic resources planning, we encourage the use of currently available geospatial analyses of the distribution, condition and vulnerability of aquatic resources in the project area; consider the recent publication, *A geospatial assessment on the distribution, condition, and vulnerability of Wyoming's wetlands.*[4] This assessment maps focal wetland complexes shown by wetland density and the ranking of wetland complexes based on number, condition, biological diversity and rarity. We believe this is the type of information which should be considered as FEIS alternatives are refined.

Nationwide vs. Individual Permits

While we recognize there is a specific description for linear projects provided in the 2007 Nationwide Permits' definition of "single and complete project", we also note that Nationwide permits are intended for projects with minimal individual and cumulative impacts, as well as projects that have independent utility. We are concerned, therefore, that the use of Nationwide Permit 12 may not be appropriate for the entire length or within certain sections of the Project.

Recommendation

- Because the terms and conditions of Nationwide Permit 12 (i.e., the definition of "single and complete project" and "independent utility") will play a role in which type of permits the Army Corps of Engineers (ACE) may authorize the proposed work under, and, because General and Individual Permits follow a different review process and timeline, we recommend that the FEIS disclose where project features would impact multiple individual channels in a braided stream or river, or multiple individual arms of a large irregularly shaped wetland or lake. We are especially interested in instances where project impacts to single aquatic resources - including multiple individual channels in a braided stream, or multiple arms of a large wetland or lake – are likely to be greater than ½ acre. Regardless of permit type, should compensatory mitigation be required, the Final Mitigation Rule requires that it be sufficient to replace the lost aquatic resource functions (40 CFR 230.93(f)(1)).

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[4] H.E. Copeland et al. Ecological Indicators 10 [2010]

Wetland Delineations

We have two concerns about the Agency Proposed Mitigation Measure WET-2.[5] Our first concern is that Agency Proposed Mitigation Measures, such as WET-2, only apply to Federal land. To clarify: wetland delineations for CWA Section 404 permitting would be necessary regardless of landownership.

Recommendation

- Because wetland delineations would be necessary regardless of landownership, recommend the proponents to adopt WET-2 for the whole project.

Our second concern is that limiting wetland delineations to "...prior to construction..." may not effectively support permitting processes and could result in noncompliance with the Guidelines.

Recommendation

- We recommend that WET-2 be amended so that the results of wetland delineations would be included in CWA Section 404 permit applications.

WET-1 and TESWL-1

WET-1[6] and TESWL-1[7], like WET-2 and other Agency Proposed Mitigation Measures, generally only apply to Federal lands. We recognize the BLM's role in granting a ROW permit and would suggest that applying these specific, and other similarly protective, Agency Proposed Mitigation Measures, to the whole project would likely result in substantial environmental benefits. We also would suggest that, by not following these mitigation measures on the whole project, and by not separating environmental impacts to landownership, the DEIS inaccurately presents impacts.

Recommendations

- To avoid and minimize impacts to aquatic and water resources, we encourage the proponents to adopt WET-1 and TESWL-1 for the whole project

  If the proponents adopt WET-1 for the whole project, Inland Fish Strategy (INFISH) buffers for fish-bearing and non-fish bearing waters and wetlands would be followed. Such a project wide EPM would be environmentally protective because the EPA consistently recognizes INFISH buffers as adequately protective of aquatic and water resources.

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[5] "Wetland delineations will be performed prior to construction to support CWA Section 404 permitting and to minimize Project impacts. The delineation will identify both wetland and non-wetland waters of the United States that would be affected by the Project." (DEIS, p. 2-153)

[6] Impacts on wetland and riparian areas shall be avoided unless physically or economically infeasible. Land management agencies' plans (RMPs and Forest Plans) that have standards, guidelines, stipulations, or avoidance buffers will be adhered to. Where these do not exist, Inland Fish Strategy (INFISH) buffers for fish-bearing and nonfish-bearing waters and wetlands will be followed.

[7] For the protection of aquatic and riparian/wetland dependent species, surface disturbing and disruptive activities should be avoided in the following areas: 1) identified 100-year floodplains; 2) areas within 500 feet of perennial waters, springs, wells, and wetlands; and 3) areas within 100 feet of the inner gorge of ephemeral channels on federally managed lands.
Where it is not possible to avoid wetland and riparian habitat, crossing-specific plans must be developed. These plans shall: 1) demonstrate that vegetation removal is minimized; 2) show how sediment would be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates. This plan must be submitted to the appropriate land management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat.

Adopting TESWL-1 for the whole project would help to protect aquatic and water resources by, for example, limiting surface disturbing activities within 500 feet of perennial waters, springs, wells, and wetlands. The crossing-specific plans required under TESWL-1 for areas where wetland and riparian habitat cannot be avoided would be useful because these plans appear to be consistent with meeting CWA Section 404 permitting requirements.

- We recommend that the FEIS include additional information and analysis to account for differing environmental impacts where Agency Proposed Mitigation Measures are and are not adopted. Address, specifically, whether and how environmental impacts would differ per land-ownership if WET-1 and TESWL-1were adopted only on Federal lands.

Water Resources

Impaired Waterbodies

According to the DEIS, "...there are no listed streams along the portion of the Project located in Wyoming...." (p. 3.16-11). Table D.16-6, however, shows at least one sediment-impaired stream in each of the Segment 4 alternatives. Table D.16-13 apparently disagrees with Table D.16-6 and discloses no TMDL or 303(d) listed streams in Wyoming. Regardless of these relatively minor discrepancies, we are concerned that the *Wyoming Water Quality Assessment and Impaired Waters List (2010 Integrated 305(b) and 303(d) Report*,[8] identifies several impaired stream segments in watersheds that could be within the Wyoming portion of the project area, depending upon the route selected.

Recommendations

- We recommend that the FEIS disclose all impaired waterbodies that could be impacted by the Project - including those which may be listed for pollutants other than sediment but that are indicators of problems with runoff, such as bacteria.

- We recommend that the FEIS include a map of the transmission line route(s) along with all 303(d) listed or TMDL streams for all pollutants. Geospatial data for 303(d) and TMDL stream segments is readily available.

National Pollutant Discharge Elimination System (NPDES)

Recommendations

- To facilitate meeting NPDES permit requirements in Idaho, we recommend that the FEIS address how project planning for the Gateway West Transmission Line has followed the steps detailed in Section 4 of the document, *Catalog of Stormwater BMPs for Idaho Cities and Counties*.[9] We believe that the steps outlined in this document are necessary parts of adequately minimizing the risk of pollutants entering stormwater systems. Table 4.1a - Selection Matrix for Construction Site BMPs, specifically, is a useful tool for increasing the likelihood that BMPs which appropriately account for targeted pollutants and physical constraints are incorporated into final Stormwater Pollution Prevention Plans (SWPPPs). Step 5 of Section 4 provides guidance on how to effectively use Table 4.1a.

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[8] http://deq.state.wy.us/wqd/watershed/Downloads/305b/2010/WY2010IR.pdf
[9] http://www.deq.idaho.gov/media/622263-Stormwater.pdf

- See the EPA's Office of Water NPDES websites for current information regarding NPDES permitting, including general guidance on preparing SWPPP's[10] and resources related to the EPA's proposed new Construction General Permit.[11]

Shallow Groundwater

The DEIS discloses that in some places the depth to groundwater in Segment 4 is quite shallow—1 to 4 feet. Shallow groundwater is vulnerable to land use activities and safeguards should be put in place to ensure that installation of the transmission line towers do not impact groundwater quality, regardless of whether the shallow groundwater is associated with a wetland or riparian area.

Recommendation

- The EPA recommends that the FEIS include a commitment to avoiding shallow groundwater areas when siting towers to prevent potential contamination.

Air Quality

We support the proponents' proposed EPM for dust suppression (TR-2). We also support the mitigation measures that were proposed by the agencies and have been adopted by the proponents to reduce air quality impacts (AIR 1-4). Several of these measures are consistent with general recommendations from the EPA's National Clean Diesel Campaign.[12]

Recommendation

- To further reduce construction, operation and maintenance air quality impacts we recommend that the agencies and proponents consider incorporating a diesel retrofit EPM for the whole Project. Requiring equipment that does not have diesel particulate filters to have filters installed, for example, can reduce particulate matter emissions up to 90%.[13] For additional strategies, grants, and publications on how to reduce diesel emissions from construction equipment and vehicles see the EPA's Clean Construction USA website.[14]

Existing Transmission System Constraints

Reliability

We believe that the siting constraint - 1,500 foot minimum separation between existing and proposed transmission lines serving the same load – is overly conservative and would result in environmental impacts which should be avoided.

We recognize that this siting constraint serves the broad goal of ensuring reliability and specifically aims to meet the Western Electricity Coordinating Council Board of Directors' 2008 Regional Transmission Planning Criterion. The criterion requires a separation of the longest span length of the two transmission circuits at the point of separation, or 500 feet, whichever is greater. The Project's 1,500 foot separation constraint is different because it is based on the longest span overall. Such a conservative interpretation of the WECC's criterion may result in unnecessary adverse environmental impacts.

While we recognize the utility of a conservative separation constraint for the initial siting study, we do

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[10] http://cfpub.epa.gov/npdes/stormwater/swppp.cfm
[11] http://cfpub.epa.gov/npdes/stormwater/cgp.cfm
[12] http://epa.gov/cleandiesel/
[13] http://www.epa.gov/cleandiesel/verification/verif-list.htm
[14] http://www.epa.gov/cleandiesel/construction/

not believe that project wide application of this constraint would be fully protective of the environment. Therefore we believe it should be looked at more closely as the project enters the FEIS development stage. We are interested in whether and how: (i) meeting the letter of WECC's transmission criterion, which is site specific, would result in decreased environmental impacts as compared to project wide application of a separation distance based on the longest possible span; and, (ii) a risk-based reliability analysis could inform reasonable flexibility on this separation constraint.

Recommendations

- We recommend that the BLM and proponents work closely with WECC to achieve environmental benefits through flexibility on this major siting constraint. The FEIS should incorporate any possible siting refinements into FEIS alternatives and disclose their environmental benefits, if any.

- If flexibility on this constraint is not possible, we recommend that the FEIS include additional information, such as the results of a reliability analysis, which more thoroughly justifies the project wide application of a 1,500 foot minimum separation distance between existing and proposed transmission lines.

Environmentally Preferable Alternative

The Council on Environmental Quality (CEQ) encourages comments that address the question of identifying the Environmentally Preferable Alternative.[15] The EPA believes consideration of the following issues and recommendations would assist the BLM in identifying this Project's Environmentally Preferable Alternative.

Overall, we encourage the BLM to follow the CEQ's "NEPA's 40 Most Asked Questions" expression of the ordinary meaning of the environmentally preferable alternative. Namely, according to this CEQ memorandum, the environmentally preferable alternative would be the alternative that causes the least damage to the biological and physical environment, and best protects, preserves, and enhances historic, cultural, and natural resources. In general, we believe that the alternative which minimizes the use of "Greenfield routes" would be more likely to cause the least damage and best protect resources.

While the alternative with the least "Greenfield" would likely cause less damage and better protect resources, we recognize that determining the environmentally preferable alternative may not be as simple as minimizing Greenfield routes. There are numerous challenging trade-offs among impacts and the project area has a history of development which may or may not have appropriately accounted for sensitive resources. We would welcome the opportunity to contribute to discussions regarding the identification of an environmentally preferable alternative.

While our review of the DEIS has not resulted in a specific set of alternative routes for the Project's segments which we believe would, in combination, be the environmentally preferable alternative , we suggest that the following design and structure variations appear to be environmentally preferable.

- A smaller Right of Way (ROW) and fewer helicopter landing pads make the single double-circuit design variation appear to be a likely component of an environmentally preferable alternative.

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[15] See Question 6b at http://ceq.hss.doe.gov/NEPA/regs/40/1-10.HTM#6

- A smaller required operational space and decreased relative potential for direct impacts to birds make the self-supporting single-circuit steel lattice 500-kV structure appear to be a more likely component of an environmentally preferable alternative than the guyed structure.

Cultural Resources

Tribal Consultation

We encourage the agencies' and proponents' ongoing efforts to consult with affected Tribes. We agree with the DEIS's characterization that the affected Tribes are the most qualified experts on issues such as impacts to their traditional cultural properties (TCPs), values, and, treaty rights.

While we appreciate and support the ongoing ethnographic research that is being conducted in collaboration with affected Tribes, we are concerned that neither the Proponent Proposed EPMs nor the Agency Proposed Mitigation Measures explicitly include ongoing tribal consultation.

Recommendations

- We recommend that the agencies propose and encourage the proponents to adopt EPMs, or some other appropriate mechanism(s), that would ensure that designated tribal officials/ representatives with special expertise on relevant TCPs, values and treaty rights are directly engaged in the Project. We believe that such an EPM(s), or other mechanism, would be a useful addition to the FEIS's Cultural Resource and Paleontological Monitoring and Mitigation Plan.

- We support the use of conclusions from Ethnographic Research to refine FEIS alternatives.

Mitigation and Monitoring

According to the CEQ's January 14, 2011 Memorandum on the Appropriate Use of Mitigation and Monitoring, failure to document and monitor mitigation may undermine the integrity of the NEPA review (p. 2).[16] Because this type of concern has, according to the CEQ, long been recognized, we are concerned that responsibility for ensuring that contractors and employees implement EPMs and Mitigation Measures appears to lie solely with the proponents and is not expressed in sufficient detail.

Recommendation

- We recommend that the FEIS include additional information about how the implementation and monitoring of EPMs will be ensured. Please identify responsible entities and scheduling issues for monitoring compliance. Examples of contractual agreements or a description of how the contracting strategy would ensure full implementation of all EPMs and mitigation measures associated with the ROD's selected alternative could be an effective means of disclosure.

Invasive Plant Species

We agree with the DEIS's description of the potential adverse effects of non-native plant invasions (p. 3.6-11). These invasions can, among other things, alter fire regimes and other ecosystem processes. We note that, according to the DEIS, wildfires pose a substantial threat to the reliability of transmission lines.

We appreciate the performance oriented goals of the Agency Proposed Mitigation Measures WEED-4 and VEG-12.

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[16] http://ceq.hss.doe.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf

"Annual post-construction monitoring and treatment of invasive plants shall continue for at least 3 years. If after 3 years post-construction conditions are not equivalent or better than pre-construction conditions, monitoring and treatment will continue until these conditions are met (also see VEG-12)."

We are concerned however, that WEED-4 and VEG-12 only apply to federally managed lands. On private lands, the proponents have limited their responsibility to reduce/ eliminate infestations of noxious weeds caused by Project-related activities and to prevent the spread of new and existing populations within the Project area to a period of three years (DEIS, Appendix C-2, p. 3). Because of this limitation, we believe that invasive plants would be more likely to spread on private lands than on Federal lands and this difference should be disclosed in the FEIS.

Recommendations

- We recommend that the proponents adopt WEED-4 and VEG-12 as EPMs for the whole project.

- If WEED-4 and/or VEG-12 are not adopted by the proponents, we recommend that the FEIS be revised to more clearly address the impacts of no long-term, goal oriented invasive plant monitoring and treatment outside of federal lands. The FEIS should address, for example, whether and how invasive plant infestations that would result from long-term Project operations and maintenance activities which are not coupled with invasive plant monitoring and treatment could impact socio-economic resources such as private land values.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.